

**REMARKS**

This Response addresses the issues raised by the Examiner in the Office Action mailed September 20, 2005. Initially, Applicants would like to thank the Examiner for the careful consideration given this case. In view of the above amendments and the following remarks, Applicants feel that all outstanding issues have been addressed and prompt allowance of all remaining claims is respectfully requested.

**Status of the Claims**

In the June 7, 2004 Office Action, the Examiner rejected the existing claims in light of U.S. Patent Publication No. 2002/0005902 to Yuen ("Yuen"). In response to this, Applicants amended the independent claims of the present invention to specifically include two concepts: (1) maintaining the size of the target object through each of the plurality of different camera views or video feeds by controlling the focal length of the various cameras ("means for controlling the focal length of each additional camera such that the size of the moving object of interest is generally equal in each of the master and slave cameras"); and (2) including a control in the user interface to select successive additional camera images to effectuate a partial rotation around the object of interest in the display (while maintaining the size of the object of interest during virtual rotation). See Claim 1. Clearly, neither of these concepts was shown in Yuen.

In the January 27, 2005 Office Action, the Examiner withdrew his rejection related to Yuen and argued that U.S. Patent No. 5,164,827 Paff ("Paff") anticipates the amended claims of the present invention. As pointed out in Applicants' response to the January 27, 2005 Office Action, the Examiner almost completely ignores the amended portion of the claims in making his arguments. In

fact, Paff is clearly distinguishable and is merely a general purpose security system patent.

### §102 Rejection

In the present Office Action, the Examiner has again ignored the amended portions of the claims, and has, for example, eviscerated the plain meaning of claim terms such as “a control to select successive additional camera images to effectuate a partial rotation around the object of interest in the display.” See Office Action at 3. Clearly, the Examiner completely reads out novel aspects of the claims, and such a rejection is unsupportable on its face. However, in an effort to bring the present prosecution to a successful and swift conclusion, Applicants have amended the independent claims in order to even more particularly distinguish them from Paff and all other known prior art.

### Paff Reference

#### a. Focal Length Control

As stated in previous responses, the first key area of the claims not addressed by Paff involves adjusting the focal length of the additional (slave) cameras in order to maintain the size of the target object in each of the plurality of additional cameras as these cameras are directed based upon the position of the master video camera. In an attempt to address this limitation, the Examiner points to a brief mention at the end of Paff that:

The slave cameras SD1-SD5, responsive to this information, can then adjust their own zooming states or conditions so that the subject is viewed at approximately the same magnification as with the master camera. In this manner, if the zooming state of the master camera is set to wide angle so that a large group of subjects can be tracked through the premises, the slave cameras will also be set to a wide angle position.

Paff at col. 8, lines 2-10. This section of Paff discusses only a general condition of wide angle or normal zooming function. It does not teach or suggest any aspect of the claimed focal length adjustment which provides output-video quality size maintenance such that the video feeds from the plurality of cameras can be selected sequentially (one-by-one) and the size of the object of interest is maintained.

The Examiner states that “it is well known in the art that when adjusting the focal length on the camera, it affects the zoom.” Office Action at 3. This statement is generally untrue (and irrelevant to the claims), and the Examiner has not pointed to any source to show the same. As described and claimed in the present invention, the adjustments made to the focus and the adjustments made to the zoom are two completely different attributes to be controlled. The Examiner’s conclusory statements to the contrary do not constitute a proper rejection, and, alternatively, cannot form a proper prima facie case of obviousness. In order to cure this improper rejection, the Examiner must show the teaching of this element within Paff (which does not exist) or some other source.

b. The “Spin” User Controller

More importantly, Paff does not have any disclosure whatsoever about the control in the user interface that allows the selection between successive additional camera images in order to carry out the “virtual” rotation around the target object (either at a single instant in time or sequentially – Claim 4). Specifically, prior to the present amendment, the “user interface” was claimed to include “a control to select successive additional camera images to effectuate a partial rotation around the object of interest in the display such that the size of the object of interest remains generally equal throughout the rotation through successive additional camera images.” See Claim 1. The Examiner, in attempting to create a rejection where no support exists, cites to the following passage of Paff:

The station 11 can be provided with a graphics capability which, based on the coordinate position of a subject, locates an icon (graphical representation) of the subject on a floor plan of the premises 1 that is displayed on the station monitor. This would indicate the location of the subject relative to the floor plan of the premises.

Paff at col. 8, lines 16-22. In other words, the cited portion of Paff is merely directed to a picture of a floor plan (of a store) upon which an icon of a target object may be placed for location purposes. It has absolutely nothing to do with the claimed control in the user interface, and it has absolutely nothing to do with creating an output video stream in which the various video feeds are selected, one-by-one, to create a feeling of rotating around the target object.

Moreover, the examiner has now stated (again without any support) that Paff teaches providing images from a target object “from different spatial perspectives” and that this is somehow the same as a single user control that allows for the virtual “spinning” or rotation” of the viewer around the object of interest (or the object of interest around a vertical axis) in order to “effectuate partial rotation around the object of interest.” Office Action at 3. At most, Paff contains one or more video monitors that can show a feed from one or more security cameras. It contains no teaching or suggestion of any user control that provides for a virtual rotation around the object of interest (as if the viewer is suspended around the object of interest and “flies” in a partial circle around the object). In fact, this is impossible with the system of Paff, and the Examiner has not pointed to any portion of Paff that teaches this feature. Instead, the Examiner merely states that showing camera feeds from “different spatial perspectives” is the same as this claim language. Common sense and the plain meaning of the language of the claims counsel that the Examiner is incorrect here.

Claim Amendments

The Examiner and Applicants do not really disagree about the scope of the prior art. However, Applicants believe that the Examiner is not giving a proper meaning to the plain language of the claims. In a final effort to plainly claim that which constitutes the present invention (and that which clearly distinguishes over Paff), Applicants have further amended independent Claims 1, 7, 11 and 13 above in order to more fully develop the “control device” of the user interface that is used to virtually “spin” or “rotate” the user around the object of interest. The claimed control provides the user with the feeling and experience of “flying” around the scene of the action (object of interest). This is especially useful for sporting events during slow-motion replays.

Specifically, this portion of the present claims now specifically recites that the user control used to spin or rotate the user around the object of interest is adapted to successively select additional camera images from adjacent cameras. In other words, the cameras (master and slaves) surround the object of interest, and the user interface includes a control knob that spins the video feed from one camera to the next adjacent camera feed, to the next adjacent camera feed, and so forth. Through this effect, which is not taught or suggested by Paff, a user watching the video display will get the sensation that they are flying around the object of interest, either at a point frozen in time or sequentially. This effect has been shown especially desirable during slow-motion sequences at sporting events, but has applicability across many genres.

Moreover, this disclosed and claimed user control is much more advanced than the ability to merely display an object of interest from “different spatial perspectives” as suggested by the Examiner. These amendments are merely clarifying in nature and are not intended to change the scope of the present claims

in any way. They are intended instead to more clearly point out the vast differences between the present invention and the prior art.

Request For Interview

Since Applicants feel that the Examiner is not giving the language of the claims its common and ordinary meaning, Applicants have included with this Amendment an Applicant Initiated Interview Request Form for the week of January 3-6. In the interview, Applicants would like the opportunity to discuss the prior art and the independent claims of the present invention to more particularly point out the many distinctions of the present claims over the cited art. Moreover, although the claims clearly overcome the Examiner's §103 rejections for all of the reasons stated above, this topic could also be discussed at an interview if required. Finally, it is noted that Applicants submitted a similar request with its Preliminary Amendment, and the Examiner ignored its request for an interview. Applicants urge the Examiner not to ignore its proper request for an Examiner interview a second time.

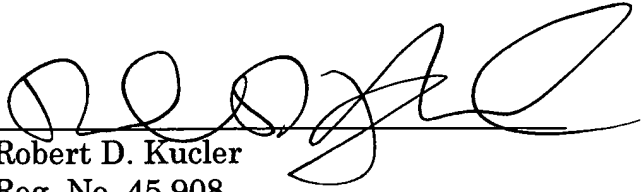
The above amendments and accompanying remarks address each and every issue raised by the Examiner in the Office Action from the parent case. Each amendment finds full support throughout the specification as noted above. Applicants believe that all claims of the present invention are now in condition for

final allowance. If the Examiner feels that any issues remain outstanding, the Examiner is encouraged to contact Applicant's attorney at the contact information below.

Respectfully submitted,

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By

  
Robert D. Kucler  
Reg. No. 45,908

REED SMITH LLP  
P.O. Box 488  
Pittsburgh, PA 15230-0488  
(412) 288-4598

Attorney for Applicants